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10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;
16 OTTOMOTTO LLC; OTTO TRUCKING
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF LINDSAY COOPER
IN SUPPORT OF PLAINTIFF WAYMO
LLC'S ADMINISTRATIVE MOTION TO
FILE UNDER SEAL ITS OPPOSITION
TO UBER'S SUMMARY JUDGMENT
PRÉCIS**

1 I, Lindsay Cooper, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Waymo’s Administrative Motion to File Under
7 Seal information in its Opposition to Uber’s Motion for Summary Judgment Précis (the
8 “Administrative Motion”). The Administrative Motion seeks an order sealing the following materials:

Document	Portions to Be Filed Under Seal	Designating Party
Portions of Waymo’s Opposition	Portions highlighted in blue	Defendants
	Portions highlighted in green	Waymo
Exhibit 1 to Waymo’s Opposition	Portions highlighted in green	Waymo
Exhibit 2 to Waymo’s Opposition	Portions highlighted in green	Waymo
Exhibit 3 to Waymo’s Opposition	Portions outlined in blue	Defendants
	Portions highlighted in green	Waymo
Exhibit 4 to Waymo’s Opposition	Entire Document	Defendants
	Entire Document	Waymo

19 3. Waymo has filed portions of Waymo’s Opposition (portions highlighted in blue) and
20 exhibits 3 (portions outlined in blue) and 4 (entire document) under seal because they contain
21 information that Defendants have designated confidential. Waymo expects Defendants to file one or
22 more declarations in accordance with the Local Rules.

23 4. Waymo’s Opposition also contains or refers to trade secret and confidential business
24 information, which Waymo seeks to seal. Portions of Waymo’s Opposition, exhibits 1-3 (portions
25 highlighted in green), and exhibit 4 (entire document) contain, reference, and/or describe Waymo’s
26 asserted trade secrets. Specifically, the highlighted portions describe proprietary information gathered
27 from technical leads across the entire self-driving program, including descriptions and names of
28 software, company goals for its technical development, specific technical design goals, and

1 identification of risks. I understand that these trade secrets are maintained as secret by Waymo (Dkt.
2 25-47) and are valuable as trade secrets to Waymo's business (Dkt. 25-31). The public disclosure of
3 this information would give Waymo's competitors access to in-depth descriptions—and analysis—of
4 the functionality of Waymo's autonomous vehicle system. If such information were made public, I
5 understand that Waymo's competitive standing would be significantly harmed. Waymo's request to
6 seal is narrowly tailored to only the confidential information.

7 I declare under penalty of perjury under the laws of the State of California that the foregoing is
8 true and correct, and that this declaration was executed in San Francisco, California, on August 24,
9 2017.

10 By /s/ Lindsay Cooper
11 Lindsay Cooper
12 Attorneys for WAYMO LLC
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SIGNATURE ATTESTATION

Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the filing of this document has been obtained from Lindsay Cooper.

/s/ Charles K. Verhoeven
Charles K. Verhoeven